

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

IN RE SQUIRRELS RESEARCH LABS LLC, *ET*
AL.

Debtors

CASE No. 21-61491-TNAP
(JOINTLY ADMINISTERED)
CHAPTER 11
SUBCHAPTER V
JUDGE PATTON

FREDERIC P. SCHWIEG, TRUSTEE

Plaintiff

v.

KYLE SLUTZ

Defendant

ADVERSARY No. 23-06031

ALL DOCUMENTS REGARDING THIS
MATTER MUST BE IDENTIFIED BY **BOTH**
ADVERSARY AND BANKRUPTCY CASE
NUMBERS AND NAME OF JUDGE

JOINT STIPULATIONS

Plaintiff and Defendant hereby stipulate to the following for the purposes of this
adversary proceeding only:

1. The court has jurisdiction over this adversary proceeding pursuant to 28 U.S.C. § 1334(b) and (d) and General Order 2012-07 of the United States District Court for the Northern District of Ohio.
2. This adversary proceeding is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A), (B), (C), (K) and (O).
3. On November 23, 2021 (the "Petition Date"), Squirrels Research Labs LLC ("Debtor") filed its voluntary petition for relief under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code").
4. At issue in this matter are certain payments that the Trustee alleges that the Debtor made to the Defendant, as set forth in the attachment to the Complaint and attached hereto both as Exhibit A (the "Payments"). This stipulation is entered for all purposes in this matter, but one specific purpose is to allow the Court to rule on certain issues as a matter of

law. The parties anticipate that said ruling will simplify this matter for trial and may facilitate settlement of at least some claims.

5. Certain of the Payments were made by the Debtor to reimburse the Defendant for money that the Defendant spent, or obligations that the Defendant incurred, for, or in connection with, business-related travel on behalf of the Debtor (“Travel Expense Reimbursements”).

6. Certain of the Payments were made by the Debtor to reimburse the Defendant for money that the Defendant spent, or obligations that the Defendant incurred, for, or in connection with, the purchase of supplies, materials, electronic components or other goods used to directly produce the Debtor’s products (“Material Expense Reimbursements”).

7. Certain of the Payments were made by the Debtor to reimburse the Defendant for money that the Defendant spent, or obligations that the Defendant incurred, for, or in connection with, the purchase of materials and services for construction or remodeling of the Debtor’s premises (“Remodeling Reimbursements”).

8. Certain of the Payments were made by the Debtor to reimburse the Defendant for money that the Defendant spent, or obligations that the Defendant incurred, for, or in connection with, the purchase of office supplies and/or office services (“Office Expense Reimbursements”).

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9. Certain of the Payments were made by the Debtor to reimburse the Defendant for money that the Defendant spent in making customer refunds (“Refund Expense Reimbursements”).

Respectfully Submitted,
/s/ Frederic P. Schwieg

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Subchapter V Trustee

Respectfully Submitted,
/s/ Jack Cooper, Esq.

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Counsel for Defendant

EXHIBIT A

Squirrels Research Labs LLC
Transactions: Kyle Slutz
All Dates

Account #	Date	Transaction Type	Num	Memo/Description	Amount	A/P Paid	Comments from D Stanfill report
1010 Checking x6063	03/29/2019	Check	634	K Slutz Reimbursement	11,000.00	Paid	Reimbursement plus interest
1010 Checking x6063	04/02/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	1,500.00	Paid	Paid against open balance
1010 Checking x6063	04/20/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	1,000.00	Paid	Home depot
1010 Checking x6063	04/20/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	1,273.23	Paid	Penske rental
1010 Checking x6063	04/20/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	1,359.63	Paid	Home depot
1010 Checking x6063	04/20/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	2,000.00	Paid	Paid against open balance
1010 Checking x6063	04/20/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	12,367.14	Paid	Paid against open balance
1010 Checking x6063	04/21/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	850.00	Paid	Cobra roll off
1010 Checking x6063	04/21/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	1,700.00	Paid	Paid against open balance
1010 Checking x6063	04/21/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	4,577.89	Paid	Paid against open balance
1010 Checking x6063	04/21/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	8,313.74	Paid	Paid against open balance
1010 Checking x6063	04/21/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	13,712.22	Paid	Digilkey
1010 Checking x6063	06/22/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	3,000.00	Paid	Paid against open balance
1010 Checking x6063	06/24/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	74.00	Paid	Garnstone Gas
1010 Checking x6063	06/24/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	112.89	Paid	Rentals
1010 Checking x6063	06/24/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	425.00	Paid	Cobra roll off
1010 Checking x6063	06/24/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	436.50	Paid	Build out
1010 Checking x6063	06/24/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	482.25	Paid	Fuel
1010 Checking x6063	06/24/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	498.38	Paid	Fuel
1010 Checking x6063	06/24/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	554.98	Paid	Fuel
1010 Checking x6063	06/24/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	705.62	Paid	Fuel
1010 Checking x6063	06/24/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	732.06	Paid	Build out
1010 Checking x6063	06/24/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	1,009.54	Paid	Fuel
1010 Checking x6063	06/24/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	3,562.75	Paid	Fuel
1010 Checking x6063	06/24/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	5,100.00	Paid	Paid against open balance
1010 Checking x6063	06/24/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	5,789.65	Paid	Build out
1010 Checking x6063	06/24/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	7,895.03	Paid	Paid WH crew
1010 Checking x6063	06/24/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	10,562.63	Paid	Paid against open balance
1010 Checking x6063	06/24/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	12,058.72	Paid	Paid against open balance
1010 Checking x6063	08/12/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	1,614.63	Paid	Paid against open balance
1010 Checking x6063	08/12/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	3,385.37	Paid	Paid against open balance
1010 Checking x6063	08/31/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	1,059.97	Paid	Paid against open balance
1010 Checking x6063	08/31/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	1,537.37	Paid	Paid against open balance
1010 Checking x6063	08/31/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	13,402.66	Paid	Paid against open balance
1010 Checking x6063	09/14/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	3,000.00	Paid	Paid against open balance
1010 Checking x6063	09/17/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	1,000.00	Paid	Paid against open balance
1010 Checking x6063	10/13/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	5,190.12	Paid	Best supply drywall
1010 Checking x6063	10/13/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	7,500.00	Paid	Paid against open balance
1010 Checking x6063	02/10/2021	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	1,000.00	Paid	Not listed in report provided by D Stanfill
					151,343.97		